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11 Attorneys for Defendant
12 Korea Times of Los Angeles, Inc.

13 UNITED STATES DISTRICT COURT

14 CENTRAL DISTRICT OF CALIFORNIA

15 WESTERN DIVISION

16 UNITED STATES OF AMERICA,

17 Civil No. CV 23 CV 10356 JAK BFM

18 Plaintiff,

19 v.

20 KOREA TIMES LOS ANGELES, INC.,

21 Defendant.

22 **STIPULATION TO SET BRIEFING
23 SCHEDULE FOR MOTION FOR SUMMARY
24 JUDGMENT**

25 STIPULATION

26 WHEREAS, plaintiff United States of America ("government")
27 intends to file a motion for summary judgment ("Motion") in this
28 action;

29 WHEREAS, the government and defendant Korea Times Los Angeles,
30 Inc. ("KTLA") desire to set a briefing schedule for the Motion to
31 ensure that the parties will be able to fully and completely address
32 all issues pertinent to the Motion;

WHEREAS, there is no trial date;

WHEREAS, the motion cut-off is currently set for April 3, 2025;

WHEREAS, the trial counsel for KTLA is scheduled to travel overseas for family vacation from April 8, 2025 to April 22, 2025, with the hotel accommodation already paid for;

THEREFORE, the parties stipulate, and request an order, that:

- (1) The government shall have until and including April 22, 2025 to file its Motion;
- (1) KTLA shall have 30 days to file its opposition to the Motion;
- (2) The government shall have two weeks from the filing of KTLA's opposition to file its reply; and
- (3) The government shall notice the hearing of the Motion in accordance with the briefing schedule above.

Dated: March 3, 2025

Respectfully submitted,

JOSEPH T. MCNALLY
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Chief, Tax Section

/s/ Robert Conte
ROBERT F. CONTE
Assistant United States Attorney

1 Dated: March 1, 2025
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